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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

MARK YOUNG, on behalf of himself and all
others similarly situated,

Plaintiff,

v.

SOLANA LABS, INC.;
THE SOLANA FOUNDATION;
ANATOLY YAKOVENKO; MULTICOIN
CAPITAL MANAGEMENT LLC; KYLE
SAMANI,

Defendants.

Case No. 3:22-cv-03912-RFL

CLASS ACTION

**PLAINTIFF'S UNOPPOSED
ADMINISTRATIVE MOTION TO ALIGN
BRIEFING SCHEDULES**

JURY TRIAL DEMANDED

1 Pursuant to Civil Local Rule 7-11, Lead Plaintiff Mark S. Young (“Plaintiff” or “Young”) files
2 the instant Motion for Administrative Relief to request that the Court conform the briefing schedules
3 for Defendants’ Motions to Dismiss and Defendants’ Motion to Compel Arbitration.

4 On July 1, 2022, Plaintiff filed his initial Class Action Complaint in the instant action, alleging
5 claims for violation of Sections 5, 12(a)(1), and 15 of the Securities Act, and violations of California
6 Corporations Code Section 25110 and 25503, against Defendants Solana Labs, Inc. (“Solana Labs”),
7 Solana Foundation, Anatoly Yakovenko, Multicoin Capital Management LLC (“Multicoin”), Kyle
8 Samani (“Samani”), and FalconX LLC (“FalconX”). ECF No. 1. On September 6, 2022, Young filed
9 his Motion to Appoint Lead Plaintiff and Lead Counsel. ECF No. 33. On November 13, 2023, the
10 Court issued an Order re Lead Plaintiff and Lead Counsel, appointing Young as Lead Plaintiff and
11 Schneider Wallace Cottrell Konecky LLP as Lead Counsel. ECF No. 59.

12 On January 12, 2024, Plaintiff filed his Consolidated Amended Class Action Complaint (the
13 “Amended Complaint,” which dropped FalconX as a Defendant. ECF No. 68. At Defendants’ request,
14 on February 13, 2024, the Parties filed a Stipulation and Proposed Order Continuing Defendants’ Time
15 to Respond to Consolidated Amended Class Action Complaint. ECF No. 70. The Stipulation provides
16 that Defendants’ *responses* to the Amended Complaint were due by April 11, 2024. *Id.* Plaintiff would
17 file its opposition(s) by May 13, 2024. *Id.* Defendants would file their replies by June 12, 2024. *Id.*
18 On February 14, 2024, the Court entered the Stipulation. ECF No. 71. On April 2, 2024, Defendants
19 filed an Administrative Motion to Extend Page Limits in connection with their motions to dismiss.
20 ECF No. 72. On April 3, 2024, the Court entered an Order granting the motion. ECF No. 73.

21 On April 11, 2024, Defendants filed their Motions to Dismiss Consolidated Amended Class
22 Action Complaint. ECF Nos. 76 & 80. To Plaintiff’s surprise, Defendants also filed a Joint Motion to
23 Compel Arbitration (“Motion to Compel”). ECF No. 78. On April 11, 2024, Defendants filed a
24 corrected briefing and hearing schedule for the Motions to Dismiss, but they did not address the
25 Motion to Compel Arbitration. ECF No. 81. An inconsistent briefing schedule was set for the Motion
26 to Compel: oppositions were due by April 25, 2024, replies are due by May 1, 2024, and, importantly,
27 the hearing date for the Motion to Compel is scheduled for August 6, 2024. ECF No. 78.

28 PLAINTIFF’S UNOPPOSED ADMINISTRATIVE MOTION
TO ALIGN BRIEFING SCHEDULES

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Through the instant Motion, Plaintiff now respectfully requests that the Court align the briefing schedules for the Motions to Dismiss and the Motion to Compel. Plaintiff did not realize the briefing schedules for the Motions to Dismiss and Motion to Compel were different until April 29, 2024, when Plaintiff was reviewing the docket to confirm deadlines. Declaration of Matthew S. Weiler in Support of Motion for Administrative Relief (“Weiler Decl.”), ¶ 2. On April 29, 2024, Plaintiff contacted Defendants, and requested that they confirm the briefing schedules. *Id.* at ¶ 3. On April 30, 2024, Defendants responded that they do not oppose any request to align the Motion to Compel briefing with the Motion to Dismiss briefing. *Id.* Defendants will not be prejudiced by the alignment, as they will receive additional time to file their Reply in support of the Motion to Compel, and the hearing date on the Motion to Compel has always been August 6, 2024. *Id.* at ¶ 4. Accordingly, Plaintiff respectfully requests that the Court align the deadline for Plaintiff’s Response to the Motion to Compel (from April 25, 2024) to May 13, 2024, in accordance with the deadline for Plaintiff’s Oppositions to Defendants’ Motions to Dismiss. Plaintiff further requests that the Court align the deadline for Defendants’ Reply to the Motion to Compel (from May 1, 2024) to June 1, 2024, in accordance with the deadline for Defendants’ Replies in Support of their Motions to Dismiss. The hearing date of August 6, 2024 shall remain intact.

Dated: April 30, 2024

Respectfully submitted,

/s/ Matthew S. Weiler

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